

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

WILBUR W. WASHINGTON,

Plaintiff,

v.

Civil Action No. 4:22-cv-00922-O

CENTER STREET FINANCE, LP, d/b/a  
CSF SERVICING,

Defendants,

\_\_\_\_\_ /

**SECOND MOTION FOR EXTENSION OF TIME TO  
FILE RESPONSE TO MOTION TO DISMISS**

**NOW COMES** Wilbur W. Washington, (“Plaintiff”), by and through his undersigned counsel, moving this Honorable Court for an extension of time for Plaintiff to file his response to Defendant’s Motion to Dismiss (“Defendant’s Motion”), and in support thereof, stating as follows:

1. On October 13, 2022, Plaintiff filed the instant action against Defendant seeking redress for violations of Fair Credit Reporting Act (“FCRA”) pursuant to 15 U.S.C. §1681 et seq. [Dkt. 1]
2. On November 23, 2022, Defendant filed a Motion to Extend Time to Respond to Plaintiff’s Complaint. [Dkt 11]
3. On December 1, 2022, the Court entered an Order granting Defendant’s Motion to Extend its Response to Plaintiff’s Complaint through December 9, 2022. [Dkt 12]
4. On December 9, 2022, Defendant filed a Motion to Dismiss Plaintiff’s Claims. [Dkt 13]

5. Pursuant to Local Rule 7.1(e), Plaintiff's response to Defendant's Motion was due on or before December 29, 2022.

6. Due to holidays, a planned vacation and other professional deadlines, Plaintiff filed a Motion for Extension of Time to File Response to Motion to Dismiss requesting a 21-day extension through January 12, 2023, to submit his response to Defendant's Motion. [Dkt 15]

7. Due to unforeseen circumstances, Plaintiff is requesting a 14-day extension through January 26, 2023, to submit his response to Defendant's Motion.

8. The extension is sought in good faith and will not prejudice Defendant.

9. Based on the foregoing, there is good cause to grant the extension sought herein.

**WHEREFORE**, the Parties respectfully request that the Court enter an order (1) extending the deadline for Plaintiff to submit his response to Defendant's Motion through January 26, 2023.

DATED: January 12, 2023

Respectfully submitted,

/s/ Alexander James Taylor  
Alexander James Taylor, Esq.  
Florida Bar No. 1013947  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2022, I electronically filed the foregoing with the Clerk of the Court for the Northern District of Texas by using the CM/ECF system.

/s/ Alexander James Taylor